

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
ONE MANHATTAN WEST  
NEW YORK, NY 10001

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

DIRECT DIAL  
(212) 735-2588  
DIRECT FAX  
(917) 777-2588  
EMAIL ADDRESS  
JESSICA.DAVIDSON@SKADDEN.COM

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June 26, 2024

**VIA ECF**

The Hon. Renée Marie Bumb  
Chief United States District Judge  
District of New Jersey  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Chief Judge Bumb:

I write in response to Mr. Slater's letter to the Court of June 25 (ECF [2757](#)) regarding ZHP's forthcoming reply in support of its objection to Special Master Order 98. Mr. Slater claims that ZHP has missed its reply deadline in support of its objections, which would have been June 24 under L.R. 7.1(d)(3) based on the original July 1 motion day. (ECF [2757](#).)

Prior to the passage of ZHP's June 24 reply deadline, ZHP's counsel confirmed that its reply would in fact not be due until July 16 based on the Court's agreement to hear argument on ZHP's objections at the July 23 status conference. (*See* Email from L. Smith to N. Rose, June 24, 2024, 10:39am (Ex. 1); *see also* ECF 2754 (text order granting request to hold argument on July 23).) Upon receipt of Mr. Slater's letter to the Court, ZHP's counsel forwarded Ms. Smith's email correspondence confirming ZHP's reply deadline of July 16 to Mr. Slater and asked Mr. Slater to withdraw his letter to the Court. (*See* Email from N. Rose to A. Slater, June 25, 2024 12:13pm (Ex. 2).) Plaintiffs' counsel has not responded to that request.

ZHP intends to submit the reply on July 16, unless the Court would prefer to review it earlier.

The Hon. Renée Marie Bumb  
June 26, 2024  
Page 2

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Jessica Davidson".

Jessica Davidson

cc: All counsel of record (via ECF)